



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604**

110 FEB 1988

REPLY TO THE ATTENTION OF

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**CHUCK'S SEPTIC TANK SERVICE
818 E. GALLERY RD
PIQUA, OH 45356**

US EPA RECORDS CENTER REGION 5



476276

**RE: Environmental Conservation and Chemical Corporation
(Enviro-Chem or ECC) and Northside Sanitary Landfill
(NSL), Zionsville, Indiana**

In January 1987, a letter was sent to all known potentially responsible parties (PRPs) who may have legal liability under federal hazardous waste laws with respect to the disposal of hazardous waste at the above-identified facilities. The letter was addressed to the PRPs' last known address. Since that time, the PRP address list has been revised. A copy of the January 1987 letter is enclosed in the event your letter did not reach you or your status as a PRP was not known at that time.

This letter is to (1) update the information contained in the January 1987 letter, (2) issue a formal demand for reimbursement of response costs, and (3) advise you of the reasons why the U.S. Environmental Protection Agency (U.S. EPA) is not going to use the special notice procedures contained in 42 U.S.C. §9622(e).

I. Activities Occurring from January 1987 to December 1987.

A. Meetings with PRP Committees.

From January through August 1987, EPA met with representatives of PRPs who had commented on EPA's remedy proposed in the Combined Alternatives Analysis (CAA). The primary purpose of these meetings was to discuss the technical aspects of the implementation of EPA's proposed remedy for the two sites. Information obtained by EPA at these meetings and information submitted by the PRPs subsequent to the meetings failed to justify certain



changes in EPA's proposed remedy. The two most significant changes wanted by the PRPs were (1) vapor extraction of the contaminants in the top four feet of soil at ECC instead of EPA's recommendation of capping the site and groundwater collection/treatment prior to disposal to Finley Creek; and (2) an early warning monitoring system at NSL instead of groundwater collection and treatment prior to disposal to Finley Creek.

U.S. EPA did not find the PRPs' vapor extraction theory feasible because it failed to address contaminants below four feet, the possibility of any plume of contaminants from the site, and contamination seeping from the sump located on the east side of ECC. In addition, the cost figures used by the PRPs to determine the cost effectiveness of vapor extraction were deficient. The PRPs failed to consider the cost of pilot testing or of a granular activated carbon system to treat the extracted vapor. EPA's own estimate of the cost of vapor extraction exceeded the cost of capping and groundwater collection/treatment and, as a result, was not considered cost effective. These facts eliminated vapor extraction as the chosen remedy for the site.

U.S. EPA did not find the NSL PRPs' concept of an early warning monitoring system to be feasible because it failed to address (1) whether monitoring wells could be placed so as to capture any movement of contaminants through discontinuous sand lenses at the site, (2) what concentration of contaminants would trigger groundwater collection (existing monitoring wells already show contamination concentrations exceeding background in Finley Creek upstream from the site); and (3) how an early warning system could provide sufficient notice to implement a subsequent remedial action inasmuch as the southern edge of the landfill borders Finley Creek, a creek which discharges into Eagle Creek. Eagle Creek supplies drinking water to a reservoir serving the City of Indianapolis.

On September 25, 1987, the Regional Administrator signed the Record of Decision (ROD) for the two sites. The ROD described EPA's chosen remedy for the two sites. The remedy chosen was Alternative No. 5 in the CAA with minor modifications. One of the modifications was a finding that Indiana's regulations implementing requirements of the Resource Conservation and Recovery Act (RCRA) did not, at the present time, require a synthetic membrane as one of the layers in the cap covering the sites. Another modification was deletion of any requirement for the removal of sludge from the former cooling pond on ECC. This was determined not to be necessary because any contamination in the sludge would be captured and treated by the groundwater

collection treatment system. Two other modifications included leaving the concrete pad in place at ECC and no replacement of the RCRA cap in 30 years. These modifications lowered the estimated cost of the remedy for ECC/NSL to \$20 million dollars capital cost and \$28.5 million dollars present worth cost.

The ROD, as well as the administrative record developed prior to the signing of the ROD, were placed in the information repository at the Zionsville Town Hall, 110 South 4th Street, Zionsville, Indiana 46077. A copy of the administrative record is also available for review at the Offices of Region V, EPA, 230 South Dearborn, Chicago, Illinois 60604.

B. Compilation of Data Base

In January 1987, the three steering committees (identified in the January letter sent to all known PRPs) received EPA's listing of PRPs for both sites and the volumetric ranking of each PRP. These lists were preliminary and incomplete. EPA has been revising the lists when new information requires such revision. In September 1987, EPA issued a revised volumetric ranking for both sites which was sent to the ECC Settlers Steering Committee and NSL Steering Committee. A copy of volumetric ranking is also attached to this letter. Also, in September 1987, U.S. EPA sent each Steering Committee the computer print out identifying each PRP, the volume of shipments sent to the site, identification of what documents supplied this information to EPA, and the total quantity of waste sent by each PRP.

Copies of these documents may be requested of the respective Steering Committees or from U.S. EPA, pursuant to the Freedom of Information Act, 5 U.S.C. §552. Under the terms of Section 122(e)(3)(C) the volumetric list for ECC and NSL, which is attached to this letter, and other data base summaries do not constitute an apportionment, nor a statement by U.S. EPA on the divisibility of or causation of harm emanating from ECC and NSL, nor shall the lists be admissible as evidence in any proceedings.

C. Proposal for De minimus Settlement

Because of the large number of PRPs involved at ECC and NSL, U.S. EPA encourages proposals for a comprehensive settlement with the de minimus PRPs at ECC/NSL. De minimus settlements under Section 122(g) of CERCLA are settlements with PRPs for whom both of the following are minimal: (1) the amount of hazardous substances contributed by that party to the site; and (2) the toxic or other hazardous effects of the substances

contributed by that party to the site.

U.S. EPA has already had several discussions and meetings with representatives of the Steering Committees listed at the conclusion of this letter, and expects one or more de minimus proposals from these committees shortly. Any such proposal should be structured upon four basic parameters: 1) settlement costs based on an expected cost analysis of the likely response costs at the site; 2) a settlement premium multiplier paid by settling de minimus parties; 3) a volumetric cutoff to determine eligibility to participate in the settlement; and 4) the extent of release for liability to the government and the elimination of contribution exposure for settling parties. If no agreement is reached within the next 60 days on a de minimus proposal submitted by the steering committees, U.S. EPA may submit its own de minimus proposal to those parties qualifying as de minimus PRPs at ECC and NSL.

II. Demand for Reimbursement of Costs

In accordance with CERCLA, U.S. EPA has undertaken certain actions and incurred costs in response to conditions at ECC and NSL. These costs include unreimbursed emergency removal costs at ECC, as well as the cost of Remedial Investigations and Feasibility Studies at both sites and the cost of a Combined Alternatives Analysis. Also, additional costs for the pre-design and design for implementation of the remedy are presently being incurred by U.S. EPA.

Some PRPs settled a portion of their liability for the ECC costs by entering into a Partial Consent Decree with U.S. EPA in 1983 under which they undertook an immediate removal at the cost of \$2,909,386. See U.S.A. v. Environmental Conservation & Chemical Corporation, et al., Civil Action No. IP 931419C, September 1983. As of September 9, 1987, U.S. EPA's unreimbursed costs of the response action at ECC, including the cost of the Remedial Investigation and Feasibility Study, are approximately \$3,358,456. The unreimbursed costs at NSL are approximately \$1,308,349. as of December 10, 1987. In accordance with Section 107(b) of CERCLA, as amended, demand is hereby made for payment of these amounts plus any and all interest authorized to be recovered under that Section or under any other provisions of law.

III. Reasons for Not Issuing Special Notice Letters.

Section 122(a), 42 U.S.C. §9622(a), requires U.S. EPA to give the reasons for not using the special notice procedures in Section 122(e). Special notice procedures are appropriate

if U.S. EPA determines that a 60-day period of negotiations would facilitate an agreement with the PRPs. It is U.S. EPA's determination, that insofar as ECC and NSL are concerned, that the following circumstances preclude the use of special notice procedures at this time:

(1) All known PRPs received a general notice letter in January 1987 regarding their liability for response actions at ECC and NSL.

(2) Numerous negotiations were held with representatives of the PRPs from January through August 1987 regarding the PRPs' implementation of U.S. EPA's proposed remedy. To date, none of the steering committees, except for the de minimus committee headed by George Pendygraft, has recognized that U.S. EPA's selected remedy in the ROD is the appropriate remedial action for ECC and NSL.

(3) There are numerous PRPs involved at ECC and NSL. At the present time, there are approximately 516 at ECC and 244 at NSL, as well as four steering committees representing the various PRPs. In addition, information is still being received by EPA from transporters identifying additional PRPs. This fact makes it difficult and time consuming for the PRPs to arrive at a settlement proposal.

(4) It is important that no delay occurs in implementing the remedy at ECC and NSL. In order for U.S. EPA to design the cap covering ECC and NSL, U.S. EPA needs to place markers on and around the site, survey the area and take aerial photographs. Once this is done, it is important that the construction of the cap begin while the contours of ECC and NSL, obtained by these activities, can still be used in the design of the cap. A lengthy delay in the construction of the cap could alter the contours by erosion, freezing and thawing and other weather-related conditions. For your information, enclosed is a schedule for the pre-design work.

IV. ECC and NSL Steering Committees

Since the January 1987 letter, some of the chairpersons for the ECC and NSL steering committees have changed. In addition, a new committee has been formed. The committee chairmen are identified below:

ECC Settlers Committee

Norman W. Bernstein, Esq.
Jenner & Block
1 IBM Plaza
38th Floor
Chicago, Illinois 60611

ECC Non-Settlers Committee

(Representing PRPs who refused to sign the 1980
Partial Consent Decree and PRPs who were discovered
thereafter.)

Lisa L. Fleming, Esq.
Jeffboat, Inc.
1701 East Market Street
Jeffersonville, Indiana 47130
(812) 288-0293

Northside Landfill Steering Committee, Co-Chairmen

| | |
|--------------------------|------------------------|
| David J. Hayes, Esq. | Ralph F. Hall, Esq. |
| Hogan & Hartson | Eli Lilly & Company |
| Columbia Square | Lilly Corporate Center |
| 555 Thirteenth St., N.W. | Indianapolis, IN 46295 |
| Washington, D.C. 20004 | (317) 276-3573 |

De Minimus Committee

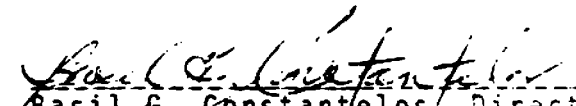
George W. Pendygraft, Esq.
Baker & Daniels
810 Fletcher Trust Bldg.
Indianapolis, Indiana 46204
(317) 237-4535

U.S. EPA will be available to meet with representatives of
the Steering Committees during the next three months regarding
implementation of the remedy in the ROD.

Any technical questions regarding the above may be directed
to Karen Vendl at (312) 886-4739. Questions on the volumetric
ranking or database may be directed to Janet Haff at (312)

886-6541. Legal questions may be directed to Elizabeth Maxwell
at (312) 886-4247.

Sincerely yours,


Basil G. Constantelos, Director
Waste Management Division

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|---|------------------------|---------|
| 1. | GENERAL MOTORS CORP (CHEVROLET; DELCO; FISHER) | 718731 | 5 |
| 2. | HANCHAR IND. WASTE MGT. (ANTHONY; CONTINENTAL) | 636625 | 4 |
| 3. | GENERAL ELECTRIC | 583085 | 4 |
| 4. | HAZARDOUS WASTE DISPOSAL, INC. (HWD) | 492800 | 3 |
| 5. | JEFFBOAT, INC. | 405643 | 3 |
| 6. | SRS, INC. (SRS OF N.J.; SRS OF NEW ENGLAND) | 335885 | 2 |
| 7. | ALUMINUM COMPANY OF AMERICA (ALCOA) | 328004 | 2 |
| 8. | ARVIN INDUSTRIES, INC. | 314675 | 2 |
| 9. | FORD MOTOR CO. | 280767 | 2 |
| 10. | LUDLOW CORP (CONTINENTAL GROUP) | 264795 | 2 |
| 11. | NORTHSIDE SANITARY LANDFILL, INC. | 263051 | 2 |
| 12. | JONES CHEMICALS, INC. | 257200 | 2 |
| 13. | PRATT AND LAMBERT, INC. | 243137 | 2 |
| 14. | LENK CO. (LENK MFG; DRACKETT; BRISTOL-MEYERS) | 239765 | 2 |
| 15. | SCIENTIFIC CHEMICAL PROCESSING, INC. | 236995 | 2 |
| 16. | MOBIL CHEMICAL CO. (MOBIL CORP) | 224068 | 2 |
| 17. | TRW, INC. (RAMSEY CORP; ROSS GEAR DIV.) | 218325 | 1 |
| 18. | KNAUF FIBERGLASS, GMBH | 210495 | 1 |
| 19. | FREIGHTLINER CORP | 208100 | 1 |
| 20. | FIRESTONE INDUSTRIAL PRODUCTS CO. | 208015 | 1 |
| 21. | UNION CARBIDE CORP | 203661 | 1 |
| 22. | HONEYWELL, INC. | 198395 | 1 |
| 23. | KENDALL CO. | 197850 | 1 |
| 24. | GENERAL TIRE AND RUBBER CO. | 185643 | 1 |
| 25. | LINDEMAN CORP | 175310 | 1 |
| 26. | BEMIS CO., INC. (BEMIS INK) | 158445 | 1 |
| 27. | KOPPERS COMPANY, INC. | 152916 | 1 |
| 28. | RCA CORP | 142224 | 1 |
| 29. | WESTERN ELECTRIC | 141025 | 1 |
| 30. | WASTE RESEARCH AND RECLAMATION CO., INC. | 134754 | 1 |
| 31. | BATESVILLE CASKET CO., INC. (HILLENBRAND) | 133260 | 1 |
| 32. | EMHART CORP (MALLORY; USM CORP; BAILEY DIV.) | 131420 | 1 |
| 33. | KIMBERLY-CLARK CORP. (BROWN BRIDGE DIV.) | 129910 | 1 |
| 34. | ALLEN-BRADLEY CO. (ROSTONE DIV.) | 123750 | 1 |
| 35. | ANDERSON DEVELOPMENT CO. | 110605 | 1 |
| 36. | U.S. DEPT. OF NAVY (NOSL; NWSC CRANE; AVIONICS) | 102320 | 1 |
| 37. | KNOWLTON BROS. (SOUTHERN SPECIALTY) | 100540 | 1 |
| 38. | TECHTRONICS ECOLOGICAL CORP | 99825 | 1 |
| 39. | R. R. DONNELLY AND SONS CO. | 92395 | 1 |
| 40. | HILL-ROM COMPANY, INC. (HILLENBRAND) | 78430 | 1 |
| 41. | ONAN CORP. (MCGRAW-EDISON) | 77990 | 1 |
| 42. | MARATHON PIPELINE CO. | 76870 | 1 |
| 43. | SUN CHEMICAL CORP | 74415 | 1 |
| 44. | ALMA PLASTICS | 73045 | 0 |
| 45. | SUPERIOR SOLVENTS (SUPERIOR OIL CO.) | 72440 | 0 |
| 46. | FOY-JOHNSTON, INC. | 67925 | 0 |
| 47. | LILLY INDUSTRIAL COATINGS | 64415 | 0 |
| 48. | NATIONAL RAILROAD PASSENGER CORP (AMTRAK) | 64365 | 0 |
| 49. | BORG-WARNER CORP. (WARNER GEAR DIV., YORK DIV.) | 64355 | 0 |
| 50. | FEDERAL-MOGUL | 64250 | 0 |
| 51. | CROWN ZELLERBACH CORP | 61966 | 0 |
| 52. | DETREX CHEMICAL INDUSTRIES, INC. (GOLD SHIELD) | 61137 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|--|------------------------|---------|
| 53. | ST. REGIS PAPER CO. | 59655 | 0 |
| 54. | WHITTAKER CORP (DAYTON COATINGS AND CHEMICALS) | 58795 | 0 |
| 55. | MARATHON PETROLEUM CO. | 58521 | 0 |
| 56. | UNITED STATES GYPSUM CO. (DURABOND PRODUCTS) | 57915 | 0 |
| 57. | VALSPAR CORPORATION | 57365 | 0 |
| 58. | MUNICIPAL EQUIP. SERVICES CO. (A.K.A. MESCO) | 56355 | 0 |
| 59. | WESTINGHOUSE ELECTRIC CORP | 55130 | 0 |
| 60. | LOUISVILLE VARNISH CO., INC. | 51775 | 0 |
| 61. | PORTER PAINT CO. | 51770 | 0 |
| 62. | CLOUDSLEY CO. | 51480 | 0 |
| 63. | UNIROYAL, INC. | 50630 | 0 |
| 64. | INDUS WHEEL CO. (CARLISLE CORP) | 49665 | 0 |
| 65. | EATON CORP | 47835 | 0 |
| 66. | INDUSTRIAL STEEL CONTAINER CORP. | 47520 | 0 |
| 67. | AMERICAN WASTE PROCESSING | 47410 | 0 |
| 68. | A. O. SMITH CORP | 47025 | 0 |
| 69. | CARPENTER BODY WORKS, INC. | 46695 | 0 |
| 70. | BRUNING PAINT CO. | 46365 | 0 |
| 71. | RED SPOT PAINT AND VARNISH CO., INC. | 46261 | 0 |
| 72. | UNITED TECHNOLOGIES (BDP CO, CARRIER, INMONT, ESSEX) | 45230 | 0 |
| 73. | TEEPAK, INC. | 44885 | 0 |
| 74. | JENN-AIR CORP (MAYTAG CO., INC.) | 44520 | 0 |
| 75. | ROCK ISLAND REFINING CORP | 41593 | 0 |
| 76. | CUMMINS ENGINE CO. | 41360 | 0 |
| 77. | SMITH CABINET MFG. CO., INC. | 40320 | 0 |
| 78. | MCDONNELL DOUGLAS ELECTRONICS CO. | 40260 | 0 |
| 79. | POTTER PAINT CO. | 40040 | 0 |
| 80. | EGYPTIAN LACQUER MFG. CO., INC. | 39635 | 0 |
| 81. | WHIRLPOOL CORP | 39302 | 0 |
| 82. | HUGHES CHEMICAL CO. | 38720 | 0 |
| 83. | STD. GRAVURE (COURIER-JRNL; LOUISVILLE TIMES) | 38115 | 0 |
| 84. | STOLLE CORP. | 35905 | 0 |
| 85. | AMERICAN CAN CO. | 34990 | 0 |
| 86. | COMMERCIAL VINYLs, INC. | 34815 | 0 |
| 87. | THE TAPPAN CO. (KEMPER DIV.) | 34815 | 0 |
| 88. | CHEMICAL RECOVERY SYSTEMS, INC. (NOLWOOD CHEMICAL) | 34028 | 0 |
| 89. | FEDERAL BUREAU OF PRISONS | 32725 | 0 |
| 90. | TIMKEN COMPANY | 32505 | 0 |
| 91. | DURAKO PAINT | 32010 | 0 |
| 92. | NORTHWAY ENVIRONMENTAL SERVICES, INC. | 31450 | 0 |
| 93. | KLOR-KLEEN | 30325 | 0 |
| 94. | THERMO KING | 30305 | 0 |
| 95. | ALCO STANDARD CORP (SYNTHANE-TAYLOR CORP) | 30030 | 0 |
| 96. | KIDDE, INC. (KIDDE MERCHANDISING EQUIP; COSCO) | 30030 | 0 |
| 97. | EDWARD H. MARCUS PAINT CO., INC. | 29810 | 0 |
| 98. | CHASE BAG CO. | 29205 | 0 |
| 99. | GULF & WESTERN MFG. (BOHN ALUM; Bohn HEAT TRANS) | 29088 | 0 |
| 100. | PELICAN SERVICE | 28910 | 0 |
| 101. | JELICO CHEMICAL CORP | 28542 | 0 |
| 102. | H-C INDUSTRIES, INC. | 28325 | 0 |
| 103. | MPI PLASTICS | 26565 | 0 |
| 104. | KING ADHESIVES CORP. | 26400 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|---|------------------------|---------|
| 105. | AMERICAN RECOVERY CO., INC. | 26242 | 0 |
| 106. | WABASH PRODUCTS CO. | 26180 | 0 |
| 107. | MANVILLE BLDG. MATERIALS (JOHNS-MANVILLE) | 26000 | 0 |
| 108. | RELIANCE ELECTRIC CO. (REEVES DIV./MASTER REEVES) | 25960 | 0 |
| 109. | ATLAN. RCHFLD. (ANACONDA-ERICSSON/WIRE & CABLE) | 25735 | 0 |
| 110. | STATE OF INDIANA (DEPT. OF HIGHWAYS) | 25575 | 0 |
| 111. | BELDEN CORP (BELDEN ELECTRONIC WIRE AND CABLE) | 25410 | 0 |
| 112. | WAYNE CORP (THYSSEN-BORNEMISZA, INC.) | 24970 | 0 |
| 113. | INTERNATIONAL PACKINGS CORP | 24935 | 0 |
| 114. | ASHLAND CHEMICAL CO. | 24915 | 0 |
| 115. | ORCHARD CORP. | 24475 | 0 |
| 116. | REXNORD, INC. | 23540 | 0 |
| 117. | FROST PAINT AND OIL CORP | 23430 | 0 |
| 118. | COMMERCIAL SEWER CLEANING CO. | 22550 | 0 |
| 119. | MID-STATES STEEL AND WIRE (KEYSTONE CONSOLIDATED) | 22450 | 0 |
| 120. | NORTH AMERICAN PHILLIPS (CENTRALAB, INC.) | 22055 | 0 |
| 121. | STANDARD PAINTS, INC. | 22055 | 0 |
| 122. | H & H INDUSTRIAL SALES AND SERVICE | 21187 | 0 |
| 123. | C-C SUPPLY CO. | 20955 | 0 |
| 124. | MARISOL, INC. | 20625 | 0 |
| 125. | SPERRY UNIVAC (AMERICAN DIV.) | 19415 | 0 |
| 126. | PRISTINE, INC. | 19260 | 0 |
| 127. | FLINT INK CORP | 18700 | 0 |
| 128. | MERCURY MINNESOTA, INC. | 18700 | 0 |
| 129. | PAPER, CALMENSEN AND CO. (PACAL STEEL) | 18700 | 0 |
| 130. | MAYS CORP | 18662 | 0 |
| 131. | CONNERSVILLE PAINT MANUFACTURING CO. INC. | 18370 | 0 |
| 132. | RUTGERS PACKAGING CORP | 18150 | 0 |
| 133. | WORLD COLOR PRESS, INC. (SALEM GRAVURE) | 17820 | 0 |
| 134. | TRICIL ENVIRONMENTAL SERVICES, INC. (SYSTECH) | 17715 | 0 |
| 135. | LEWIS CHEMICAL | 17665 | 0 |
| 136. | CHEMART | 17620 | 0 |
| 137. | GOFF, INC. | 17435 | 0 |
| 138. | BUNDY TUBING DIV. (BUNDY CORP) | 17215 | 0 |
| 139. | SOMERS CORP | 17215 | 0 |
| 140. | CHRIS GRABER | 16665 | 0 |
| 141. | SQUARE D COMPANY | 16610 | 0 |
| 142. | KYANIZE PAINTS | 16518 | 0 |
| 143. | CONCO, INC. | 16335 | 0 |
| 144. | H. H. ROBERTSON CO. | 16335 | 0 |
| 145. | GENERAL POLYMERS CORP | 15620 | 0 |
| 146. | ECONOMY PLATING CO., INC. | 15565 | 0 |
| 147. | WESTVACO CORP (U.S. ENVELOPE DIV.) | 15230 | 0 |
| 148. | JOHN PAUL | 14360 | 0 |
| 149. | HARMENSON MFG. CO. | 13915 | 0 |
| 150. | GENERAL PRINTING INK | 13865 | 0 |
| 151. | TENNANT CO. | 13860 | 0 |
| 152. | LEADER INDUSTRIES, INC. | 13750 | 0 |
| 153. | SALEM GRAVURE (WORLD COLOR PRESS) | 13750 | 0 |
| 154. | ARCO INDUSTRIES | 13695 | 0 |
| 155. | CARTER PAINT CO., INC. | 13640 | 0 |
| 156. | COCA-COLA CO. (FOODS DIV.) | 13500 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|---|------------------------|---------|
| 157. | INTERNATIONAL HARVESTER CO. | 13385 | 0 |
| 158. | PACKAGING PRODUCTS | 13284 | 0 |
| 159. | GK TECHNOLOGIES INC. (GENERAL CABLE CORP) | 12980 | 0 |
| 160. | W.B.T., INC. (LAIDLAW; THETA; METRO. DISP.) | 12870 | 0 |
| 161. | D & L PAINT CO., INC. | 12430 | 0 |
| 162. | TORIT (DONALDSON CO., INC.) | 12430 | 0 |
| 163. | METROPOLITAN DISPOSAL | 12100 | 0 |
| 164. | BIDDLE SCREW PRODUCTS | 12000 | 0 |
| 165. | UNITED STATES STEEL CORP (USS NOVAMONT) | 11892 | 0 |
| 166. | GAF CORP | 11500 | 0 |
| 167. | MONARCH CHEMICALS | 11495 | 0 |
| 168. | HOLCOMB & HOKE MANUFACTURING CO., INC. | 11330 | 0 |
| 169. | CARBORUNDUM CO. (COMMERCIAL FILTERS DIV.) | 11310 | 0 |
| 170. | WOODALL PAINT | 11220 | 0 |
| 171. | GROW GROUP, INC. (DEVOE AND RAYNOLDS CO.) | 11200 | 0 |
| 172. | AMSTED INDUSTRIES, INC. (DIAMOND CHAIN CO.) | 11000 | 0 |
| 173. | ELECTROGRAPHIC CORP (MIDWEST BODY, INC.) | 10990 | 0 |
| 174. | PHELPS DODGE INDUSTRIES, INC. | 10945 | 0 |
| 175. | ROCKWELL INTERNATIONAL | 10820 | 0 |
| 176. | REICHOLD CHEMICAL | 10615 | 0 |
| 177. | FMC CORP | 10565 | 0 |
| 178. | COLWELL/GENERAL | 10500 | 0 |
| 179. | WYANDOTTE PAINT CO. (AKZO COATINGS AMERICA, INC.) | 10395 | 0 |
| 180. | KCL CORP | 10175 | 0 |
| 181. | CHEMICAL WASTE MGT. (SOLVENT RESOURCE RECOVERY) | 10000 | 0 |
| 182. | IWD WASTE, INC. | 10000 | 0 |
| 183. | KINGSTON PRODUCTS | 10000 | 0 |
| 184. | FIREKING INTERNATIONAL, INC. (MURPHY MFG.) | 9706 | 0 |
| 185. | HI-TEK (DIV. OF LITHONIA LIGHTING) | 9680 | 0 |
| 186. | WEYERHAUSER CO., CARTON DIV | 9680 | 0 |
| 187. | STEWART PAINT MFG. CO. | 9515 | 0 |
| 188. | PAN AMERICAN INDUSTRIES, INC. | 9295 | 0 |
| 189. | CORNING GLASS WORKS | 9162 | 0 |
| 190. | CONTAINER CORPORATION OF AMERICA | 8930 | 0 |
| 191. | CHEMICAL AND SOLVENT DISTILLERS, INC. | 8910 | 0 |
| 192. | SWITCHES, INC. (WALTER KIDDE AND CO.) | 8910 | 0 |
| 193. | DA-LITE SCREEN CO., INC. | 8855 | 0 |
| 194. | SULLAIR CORP | 8855 | 0 |
| 195. | HOOVER UNIVERSAL, INC. | 8745 | 0 |
| 196. | LIBERTY SOLVENTS AND CHEMICAL CO., INC. | 8715 | 0 |
| 197. | MOORFEED CORP | 8685 | 0 |
| 198. | REXHAM CORP (FLEXIBLE PACKAGING DIV.) | 8660 | 0 |
| 199. | SUMMIT FINISHING CO. | 8305 | 0 |
| 200. | BENDIX CORP | 8275 | 0 |
| 201. | GEORGIA-PACIFIC CORP | 8250 | 0 |
| 202. | BOOTZ MANUFACTURING CO., INC. | 8195 | 0 |
| 203. | KEYSTONE GROUP (MID STATES WIRE) | 8195 | 0 |
| 204. | SPECIALTY MFG. CO. | 8195 | 0 |
| 205. | DENNIS CHEMICAL CO. | 8140 | 0 |
| 206. | GAMBLE BROS. DIV. (CELOTEX CORP) | 8140 | 0 |
| 207. | P.B. & S CHEMICAL CO. | 8140 | 0 |
| 208. | GENERAL MILLS | 8085 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|--|------------------------|---------|
| 209. | CHEMCENTRAL (HOOSIER SOLVENTS; CHEM WASTE DISP) | 7975 | 0 |
| 210. | AMERICAN MONITOR CORP | 7865 | 0 |
| 211. | BRUNNER ENGNRG. AND MFG. (HANDY AND HARMAN, INC.) | 7865 | 0 |
| 212. | FARMERS PRODUCTION CREDIT ASSOCIATION | 7752 | 0 |
| 213. | CASKET SHELLS, INC. | 7645 | 0 |
| 214. | H. B. FULLER CO. | 7590 | 0 |
| 215. | INGERSOLL-RAND CO. (VON DUPRIN, INC.) | 7590 | 0 |
| 216. | RADIO MATERIAL CORP | 7567 | 0 |
| 217. | EX-CELL-O CORP (MCCORD HEAT TRANSFER CORP) | 7150 | 0 |
| 218. | CHAMPION INTERNATIONAL CORP (CHAMPION PACKAGING) | 7095 | 0 |
| 219. | PERFECTION PAINT AND COLOR CO. | 7000 | 0 |
| 220. | INTL. TELEPHONE & TELEGRAPH (UNITED PLASTICS) | 6875 | 0 |
| 221. | A. E. STALEY MFG. CO. | 6820 | 0 |
| 222. | NEW YORK BLOWER CO. | 6820 | 0 |
| 223. | UNIVERSAL DISPLAY CORP | 6795 | 0 |
| 224. | MID MARK CORP | 6720 | 0 |
| 225. | STEWART-WARNER CORP | 6710 | 0 |
| 226. | THIELE-ENGDAHL, INC. | 6710 | 0 |
| 227. | MARLEY CO. (BARRY BLOWER CO.) | 6550 | 0 |
| 228. | IMPEX | 6380 | 0 |
| 229. | NATIONAL LATEX PRODUCTS CO. | 6270 | 0 |
| 230. | TIMESAVER PRODUCTS | 6215 | 0 |
| 231. | MEAD JOHNSON | 6100 | 0 |
| 232. | JOHN CAMPBELL TRUCKING | 6000 | 0 |
| 233. | BLISSFIELD MANUFACTURING CO. (BERNE TUBE PRODUCTS) | 5995 | 0 |
| 234. | BRULIN AND COMPANY | 5940 | 0 |
| 235. | CORDUROY RUBBER CO. | 5940 | 0 |
| 236. | INDIANAPOLIS STAR NEWS | 5885 | 0 |
| 237. | JOHNSON CONTROLS (GLOBE-UNION) | 5830 | 0 |
| 238. | MALLINCKRODT, INC. (FRIES AND FRIES) | 5775 | 0 |
| 239. | MID-STATE CHEMICALS | 5775 | 0 |
| 240. | SPARTON CORP (SPARTON INDIANA, INC.) | 5729 | 0 |
| 241. | BEST LOCK | 5720 | 0 |
| 242. | PHILIPS INDUSTRIES, INC. (LAU INDUSTRIES) | 5665 | 0 |
| 243. | MAGNETIC PERIPHERALS, INC. (CONTROL DATA CORP) | 5555 | 0 |
| 244. | ALLIED CORP. (C & D BATTERIES DIV.; ELTRA CORP.) | 5500 | 0 |
| 245. | MURRAY OHIO MFG. CORP (A.K.A. MURRAY OIL) | 5500 | 0 |
| 246. | TRIANGLE PACIFIC CORP | 5400 | 0 |
| 247. | AMERICAN STANDARD INC. (MODERNFOLD; PEABODY CO.) | 5390 | 0 |
| 248. | UNION STEEL | 5390 | 0 |
| 249. | HOERNER WALDORF CHAMPION INTERNATIONAL | 5335 | 0 |
| 250. | BROWN AND BIGELOW (ATWATER GROUP) | 5280 | 0 |
| 251. | GOULD, INC. | 5280 | 0 |
| 252. | HOUSEHOLD MFG. (W. MURRAY; SCHWITZER; RICHMOND) | 5198 | 0 |
| 253. | VERMONT AMERICAN CORP (MAGNA DIV.) | 5170 | 0 |
| 254. | LEAR SIEGLER, INC. (MAMMOTH DIV.) | 5115 | 0 |
| 255. | WHITE MATERIAL HANDLING | 5115 | 0 |
| 256. | KELLEY TECHNICAL COATINGS | 5060 | 0 |
| 257. | INDIANA UNIVERSITY, BLOOMINGTON | 5055 | 0 |
| 258. | LANE RESTORATION | 5000 | 0 |
| 259. | PPG INDUSTRIES | 5000 | 0 |
| 260. | TRI-CITY TRACTOR | 5000 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|--|------------------------|---------|
| 261. | S-T SEMICON, INC. | 4940 | 0 |
| 262. | MID-AMERICA | 4895 | 0 |
| 263. | BROWN PRINTING COMPANY, INC. | 4840 | 0 |
| 264. | NATIONAL HOMES CORP | 4840 | 0 |
| 265. | SNAP-TITE, INC. (CHEM-CLEAR) | 4800 | 0 |
| 266. | HAAS CABINET CO., INC. | 4730 | 0 |
| 267. | CHUCK'S SEPTIC TANK SERVICE | 4700 | 0 |
| 268. | RECLAIMED ENERGY CO. | 4700 | 0 |
| 269. | BATESVILLE CASKET CO., INC. (HILLENBRAND) | 4600 | 0 |
| 270. | YENKIN-MAJESTIC PAINT CORP | 4500 | 0 |
| 271. | BRODEY AND BRODEY | 4455 | 0 |
| 272. | BUCKBEE MEARS COMPANY (AQUARIUS SOFT LENS) | 4455 | 0 |
| 273. | HENKEL CORP. | 4400 | 0 |
| 274. | MARK CONTROLS CORP (POWERS-FIAT CORP) | 4400 | 0 |
| 275. | NORTHERN PACKAGING CORP (AMERICAN BAG & PAPER) | 4400 | 0 |
| 276. | PATTERSON CHEMICAL CO. | 4400 | 0 |
| 277. | PERRY CHEMICAL & MFG. CO., INC. | 4400 | 0 |
| 278. | REILLY TAR AND CHEMICAL | 4400 | 0 |
| 279. | EDWIN COOPER | 4345 | 0 |
| 280. | MOCO, INC. | 4345 | 0 |
| 281. | TALON (TEXTRON, INC.) | 4345 | 0 |
| 282. | UNITED PARCEL SERVICE | 4335 | 0 |
| 283. | E. R. CARPENTER CO. | 4300 | 0 |
| 284. | EAGLE-PICHER | 4235 | 0 |
| 285. | GRACO, INC. | 4235 | 0 |
| 286. | EXXON (WESTVILLE OIL CO) | 4070 | 0 |
| 287. | HUMKO PRODUCTS (KRAFT, INC.) | 4015 | 0 |
| 288. | ZIMMER PAPER PRODUCTS, INC. | 4015 | 0 |
| 289. | FRANKLIN ELECTRIC CO., INC. | 4000 | 0 |
| 290. | KENTUCKY SOLITE | 3962 | 0 |
| 291. | NEW IDEA FARM EQUIPMENT | 3905 | 0 |
| 292. | IVC INDUSTRIAL COATINGS | 3850 | 0 |
| 293. | MCQUAY PERFEX, INC. | 3850 | 0 |
| 294. | GREAT DANE TRAILERS | 3795 | 0 |
| 295. | HUFFY CORP | 3740 | 0 |
| 296. | PARK TRADING CO. | 3740 | 0 |
| 297. | VOLLRATH REFRIGERATION, INC. | 3740 | 0 |
| 298. | WESTERN DIESEL | 3700 | 0 |
| 299. | NORTHRUP KING CO. | 3685 | 0 |
| 300. | INTERCO, INC. | 3630 | 0 |
| 301. | TWIN-CITY MONORAIL | 3630 | 0 |
| 302. | ROBBIE MFG., INC. | 3585 | 0 |
| 303. | INTROL | 3575 | 0 |
| 304. | LORD CORPORATION (KINEMATICS) | 3575 | 0 |
| 305. | ENGINEERING RESEARCH, INC. | 3410 | 0 |
| 306. | SHERWOOD MEDICAL | 3410 | 0 |
| 307. | SIDCO INDUSTRIES | 3355 | 0 |
| 308. | UNIVERSAL-RUNDLE (INGRESS-PLASTENE; NORTHWAY) | 3305 | 0 |
| 309. | HART PRESS | 3300 | 0 |
| 310. | POTLATCH CORP | 3300 | 0 |
| 311. | EDCO PRODUCTS, INC. | 3245 | 0 |
| 312. | BEACH GROVE STAGING CO. | 3200 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|--|------------------------|---------|
| 313. | COLT INDUSTRIES (CRUCIBLE MATERIALS CORP) | 3135 | 0 |
| 314. | OLSON BODIES | 3135 | 0 |
| 315. | SOMMER METALCRAFT CORP | 3135 | 0 |
| 316. | MINNEAPOLIS, CITY OF | 3080 | 0 |
| 317. | GROW CHEMICAL | 3025 | 0 |
| 318. | HANSEN MFG. CO., INC. (IMC MAGNETICS CORP) | 3025 | 0 |
| 319. | KOLMAR LABORATORIES, INC. | 3025 | 0 |
| 320. | MILLER WAYNE PUMP | 2970 | 0 |
| 321. | SMITH SYSTEMS | 2860 | 0 |
| 322. | BROCKWAY, INC. | 2750 | 0 |
| 323. | F. E. MYERS (RICHARD BUSTER) | 2750 | 0 |
| 324. | SEYMOUR ELECTRONICS (FOSTER TRANSFORMER) | 2750 | 0 |
| 325. | TAYLOR INSTRUMENT | 2750 | 0 |
| 326. | GROTE MANUFACTURING CO. | 2695 | 0 |
| 327. | AMF (POTTER & BRUMFIELD DIV.) | 2640 | 0 |
| 328. | HOME CREST | 2640 | 0 |
| 329. | CERDEN & SON MFG., INC. | 2600 | 0 |
| 330. | ADVANCE MACHINE | 2585 | 0 |
| 331. | STANDARD PRODUCTS CO. (PRODUCT DEVELOPMENT DIV.) | 2585 | 0 |
| 332. | UNIVERSAL WOODS, INC. | 2585 | 0 |
| 333. | ELECTRIC MACHINERY | 2530 | 0 |
| 334. | HAMILTON GLASS PRODUCTS, INC. | 2530 | 0 |
| 335. | CHEMISPHERE | 2488 | 0 |
| 336. | INDIANAPOLIS DEPT. OF TRANSPORTATION | 2420 | 0 |
| 337. | RAYGO CORP | 2420 | 0 |
| 338. | AMERICAN HOIST AND DERRICK (CLEVELAND TRENCHER) | 2365 | 0 |
| 339. | MUSKEGON CHEMICALS | 2365 | 0 |
| 340. | SHERWIN - WILLIAMS | 2365 | 0 |
| 341. | STANT INC. | 2365 | 0 |
| 342. | EMCONITE DIVISION (AMERACE CORP) | 2310 | 0 |
| 343. | DEALERS MANUFACTURING CO. | 2255 | 0 |
| 344. | DELTA FAUCET | 2255 | 0 |
| 345. | SHELLER GLOBE | 2255 | 0 |
| 346. | SUNNEN PRODUCTS | 2255 | 0 |
| 347. | INDUSTRIAL SEWER SERVICE (ROTO-ROOTER DRAIN) | 2200 | 0 |
| 348. | HERFF JONES (CARNATION CO.) | 2165 | 0 |
| 349. | INDUSTRIAL PLATING, INC. | 2145 | 0 |
| 350. | MIDLAND COMMERCIAL CLEANING SERVICE | 2145 | 0 |
| 351. | CHROMALLOY CORP (PRECOAT METALS) | 2035 | 0 |
| 352. | GTI CORP (CIRCUITS DIVISION) | 2035 | 0 |
| 353. | INTERNATIONAL PAPER CO. | 2035 | 0 |
| 354. | TONKA TOYS | 2035 | 0 |
| 355. | VAN WATERS AND ROGERS DIV. (UNIVAR) | 2035 | 0 |
| 356. | CLARK OIL, PITT OIL CO., INC. | 2000 | 0 |
| 357. | B ANODIZE | 1980 | 0 |
| 358. | DEHART PAINT & VARNISH CO., INC. | 1980 | 0 |
| 359. | HUOT MANUFACTURING CO. | 1925 | 0 |
| 360. | PEERLESS WIRE GOODS | 1925 | 0 |
| 361. | UNITOG RENTAL SERVICES | 1925 | 0 |
| 362. | CTS MICROELECTRONICS, INC. | 1870 | 0 |
| 363. | PAULE CHEMICAL CO. (BEATRICE FOODS CO., INC.) | 1870 | 0 |
| 364. | VETERANS ADMINISTRATION | 1870 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|--|------------------------|---------|
| 365. | WRIGHT MANUFACTURING CORP | 1815 | 0 |
| 366. | JEFFERSON PRODUCTS CO. | 1760 | 0 |
| 367. | WILLIAMSON CO. | 1760 | 0 |
| 368. | ALLIS CHALMERS CORP | 1750 | 0 |
| 369. | CONSOLIDATED INDUSTRIES, INC. | 1705 | 0 |
| 370. | HUBER BROTHERS | 1705 | 0 |
| 371. | REGENCY ELECTRONICS | 1650 | 0 |
| 372. | SHELBY PAINT AND ENAMEL CO. | 1650 | 0 |
| 373. | SINCLAIR-VALENTINE CO. (WHEELABRATOR-FRYE INC.) | 1650 | 0 |
| 374. | SMITH'S TRANSFER CORP | 1650 | 0 |
| 375. | DANA CORP | 1595 | 0 |
| 376. | HELLA NORTH AMERICA | 1540 | 0 |
| 377. | UNIVERSAL COATING | 1540 | 0 |
| 378. | GURNEY J. BUSH, INC. | 1500 | 0 |
| 379. | INDIANA MILL & MANUFACTURING, INC. | 1500 | 0 |
| 380. | CONTINENTAL CAN | 1485 | 0 |
| 381. | WARREN SHADE | 1430 | 0 |
| 382. | SPECIAL PRODUCTS (CPC INTERNATIONAL) | 1425 | 0 |
| 383. | DELUXE CHECK PRINTERS, INC. (INDIANAPOLIS PLANT) | 1375 | 0 |
| 384. | ELECTRA CO. DIV. (MASCO CORP) | 1375 | 0 |
| 385. | NORTHLAND ALUMINUM PRODUCTS, INC. | 1375 | 0 |
| 386. | AMERICAN PRINTING HOUSE FOR THE BLIND, INC. | 1366 | 0 |
| 387. | TUCHMAN CLEANERS | 1335 | 0 |
| 388. | CENTURY MFG. | 1320 | 0 |
| 389. | FOUNTAIN INDUSTRIES, INC. | 1320 | 0 |
| 390. | CONSOLIDATED PRINTING | 1265 | 0 |
| 391. | WAVETEK INDIANA, INC. | 1265 | 0 |
| 392. | RANSBURG CORP (GLAS-CRAFT) | 1240 | 0 |
| 393. | AUDIOTRONICS | 1210 | 0 |
| 394. | MCCORMICK AND COMPANY, INC. | 1210 | 0 |
| 395. | DOMAIN, INC. | 1155 | 0 |
| 396. | MANUS PRODUCTS | 1155 | 0 |
| 397. | GEN. CONST. & ASPHALT CONTRACTING (GC&A; AVCO) | 1100 | 0 |
| 398. | MCB MANUFACTURING | 1100 | 0 |
| 399. | MCGILL JENSEN, INC. | 1100 | 0 |
| 400. | MILLER BAG | 1100 | 0 |
| 401. | STONE CONTAINER CORP (NATIONAL PACKAGING CO.) | 1100 | 0 |
| 402. | LEHIGH PORTLAND CEMENT | 1075 | 0 |
| 403. | ED TUTWILER CADILLAC, INC. | 1055 | 0 |
| 404. | LEXINGTON STANDARD CORP | 1045 | 0 |
| 405. | MCLAUGHLIN GROMLEY KING CO. | 1045 | 0 |
| 406. | NORTHERN TELECOM (DATA 100) | 1045 | 0 |
| 407. | FEDERAL CHEMICAL | 970 | 0 |
| 408. | PIONEER METAL FINISHING | 940 | 0 |
| 409. | AMERICAN INDUSTRIAL | 935 | 0 |
| 410. | CABOT CORP (EAR DIV.) | 935 | 0 |
| 411. | HIAWATHA RUBBER CO. | 935 | 0 |
| 412. | INDIANAPOLIS RUBBER CO., INC. | 935 | 0 |
| 413. | BALL CORP | 880 | 0 |
| 414. | DU-WEL PRODUCTS, INC. | 880 | 0 |
| 415. | GLOBE TOOL | 880 | 0 |
| 416. | MORTONICS CO., INC. | 880 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|------|---|------------------------|---------|
| 417. | PARKER INDUSTRIES, INC. (FLINT & WALLING) | 880 | 0 |
| 418. | DELLEN OLDSMOBILE | 870 | 0 |
| 419. | MONLAN CORP | 830 | 0 |
| 420. | BOEHRINGER MANNHEIM DIAGNOSTICS (BIO-DYNAMICS) | 825 | 0 |
| 421. | GREAT PLAINS BAG CORP (CONTINENTAL GROUP) | 825 | 0 |
| 422. | NORTHERN STATES POWER (A.K.A. NSP) | 825 | 0 |
| 423. | SPRAGUE ELECTRICAL CO. | 825 | 0 |
| 424. | EXCEL WOOD PRODUCTS CO., INC. | 800 | 0 |
| 425. | CONTACTS METALS WELDING, INC. (CMW) | 770 | 0 |
| 426. | FORMAN FORD | 770 | 0 |
| 427. | HUDSON MACHINE TOOL, INC. | 770 | 0 |
| 428. | ADVANCE CIRCUITS | 715 | 0 |
| 429. | COMMUNITY ELECTRONICS | 715 | 0 |
| 430. | OSBORNE COINAGE CO. | 715 | 0 |
| 431. | TOM O'DANIELS | 715 | 0 |
| 432. | UNIVERSITY OF MINNESOTA | 715 | 0 |
| 433. | BLILEY ELECTRIC | 660 | 0 |
| 434. | ELECTRIC WIRE | 660 | 0 |
| 435. | RAY-WEL MOTORS | 660 | 0 |
| 436. | DIGITAL | 605 | 0 |
| 437. | HURCO MANUFACTURING CO. | 605 | 0 |
| 438. | BRUCE FOX | 550 | 0 |
| 439. | COLORER METALS | 550 | 0 |
| 440. | MINNESOTA RUBBER | 550 | 0 |
| 441. | NCR CORP (SYSTEMEDIA) | 550 | 0 |
| 442. | RE TRAC MANUFACTURING | 550 | 0 |
| 443. | WOOD RIVER PRODUCTS (CONOCO, INC.) | 550 | 0 |
| 444. | INDEPENDENT WASTE SYSTEMS, INC. (GRAVER NORTHEAST) | 530 | 0 |
| 445. | ALT AND WITZIG ENGINEERING, INC. | 495 | 0 |
| 446. | ATEC ASSOCIATES, INC. (AMER. TESTING & ENGNRG.) | 495 | 0 |
| 447. | BETHESDA LUTHERAN HOSPITAL | 495 | 0 |
| 448. | HYSTER CO. | 495 | 0 |
| 449. | THERMOSET PLASTICS | 495 | 0 |
| 450. | MIAMI UNIVERSITY | 470 | 0 |
| 451. | FAIRMONT RAILWAY MOTORS DIV. (HARSCO-CORP) | 440 | 0 |
| 452. | METROPOLITAN MEDICAL CENTER | 440 | 0 |
| 453. | MICOM CORP | 440 | 0 |
| 454. | NICE-PAK | 440 | 0 |
| 455. | OGLEBAY NORTON CO. (EVELETH MINES) | 440 | 0 |
| 456. | OWENS-ILLINOIS, INC. | 440 | 0 |
| 457. | TRI-CHROMATIC | 440 | 0 |
| 458. | GENERAL ALUMINUM AND CHEMICAL CORP | 400 | 0 |
| 459. | LORANGER | 385 | 0 |
| 460. | STATE OF MINNESOTA (OFFICE OF ATTORNEY GENERAL) | 385 | 0 |
| 461. | UNITED HOSPITAL | 385 | 0 |
| 462. | BROTHER'S BODY AND PAINT, INC. | 380 | 0 |
| 463. | MAGNAVOX | 330 | 0 |
| 464. | NAUL TECHNOLOGY CORP | 330 | 0 |
| 465. | MOORMANN BROS. MFG. CO. (GAINESCRAFT CORP) | 330 | 0 |
| 466. | PAULO PRODUCTS | 330 | 0 |
| 467. | ROYAL MANUFACTURING CO. | 330 | 0 |
| 468. | SPIILL RECOVERY OF INDIANA (MIDWEST DIESEL & TRUCK) | 330 | 0 |

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

| Rank | Generator | Total Volume (gallons) | Percent |
|--------|--|------------------------|---------|
| 469. | U.S. POSTAL SERVICE | 330 | 0 |
| 470. | WESTERN PACKING | 330 | 0 |
| 471. | CISSELL MANUFACTURING CO. | 275 | 0 |
| 472. | DEPAUW UNIVERSITY | 275 | 0 |
| 473. | KAUFMAN ENGINEERING | 275 | 0 |
| 474. | MAYHILL PUBLICATION | 275 | 0 |
| 475. | PETER PAUL CADBERRY | 275 | 0 |
| 476. | SHELL OIL CO. | 275 | 0 |
| 477. | WEST PUBLISHING CO. | 275 | 0 |
| 478. | BECO PAK | 220 | 0 |
| 479. | BOWES SEALFAST | 220 | 0 |
| 480. | MADISON CHEMICAL CO., INC. | 220 | 0 |
| 481. | MCGILL MANUFACTURING CO., INC. | 220 | 0 |
| 482. | MOUNT SINAI HOSPITAL | 220 | 0 |
| 483. | SEAWAY INDUSTRIAL PAINTS | 220 | 0 |
| 484. | CRYOGENIC ASSOCIATION | 205 | 0 |
| 485. | DIMENSIONAL DESIGN, INC. | 165 | 0 |
| 486. | DONALDSON CO., INC. | 165 | 0 |
| 487. | ERIE ELECTRIC | 165 | 0 |
| 488. | GUNNISON BROS. TANNERY | 165 | 0 |
| 489. | INDIANAPOLIS POWER AND LIGHT | 165 | 0 |
| 490. | MINNESOTA DEPT. OF TRANSPORTATION | 165 | 0 |
| 491. | SEARS, ROEBUCK AND CO. | 165 | 0 |
| 492. | SERCO LABS | 165 | 0 |
| 493. | SUPERIOR FORWARDING | 165 | 0 |
| 494. | CHILDRENS HEALTH CTR | 110 | 0 |
| 495. | FORT SNELLING STATE PARK | 110 | 0 |
| 496. | SELECTRON | 110 | 0 |
| 497. | WILLIAMS CO. | 110 | 0 |
| 498. | BENDIT | 55 | 0 |
| 499. | CITATION | 55 | 0 |
| 500. | CITY MACHINE | 55 | 0 |
| 501. | CRYOMED CORP | 55 | 0 |
| 502. | DART CONTROL | 55 | 0 |
| 503. | GREYHOUND BUS CO. | 55 | 0 |
| 504. | IUPUI | 55 | 0 |
| 505. | KETTERING MEDICAL CENTER | 55 | 0 |
| 506. | LAMBEL CORP. | 55 | 0 |
| 507. | STANDARD T CHEMICAL | 55 | 0 |
| 508. | WINTEK CORP | 55 | 0 |
| 509. | ARTHUR SALEM | 30 | 0 |
| 510. | AMEDCO (NATL; YORK-ELGIN; GULF-WESTERN; WALLACE) | 27 | 0 |
| 511. | ELECTROCHEMICAL COATINGS, INC. | 12 | 0 |
| 512. | BEST FOODS (CPC INTERNATIONAL, INC.) | 10 | 0 |
| 513. | LAKEVIEW MEDICAL CENTER | 10 | 0 |
| 514. | | 0 | 0 |
| 515. | BIXEL PAINT | 0 | 0 |
| 516. | C. F. DAVIS | 0 | 0 |
| TOTALS | | 14711267 | 100 |

PREPARE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

| Rank | Potentially Responsible Party | Amount (gallons) | Per Cent of Total |
|------|--|---------------------|----------------------|
| 1 | INDIANAPOLIS DEPARTMENT OF PUBLIC WORKS | 21200997 | 21.9 |
| 2 | CAN-OR (A-A OIL, WESTVILLE TANK WASH) | 15792382 | 16.3 |
| 3 | ELI LILLY CO. | 10702640 | 11.1 |
| 4 | DOW CHEMICAL USA | 7114026 | 7.3 |
| 5 | CHRYSLER CORP | 6226500 | 6.4 |
| 6 | RSR CORP | 5477773 | 5.7 |
| 7 | METAL WORKING LUBRICANTS CO. | 3210455 | 3.3 |
| 8 | ENVIRO-CHEM CORP (ECC) | 2450520 | 2.5 |
| 9 | JONES CHEMICALS, INC. | 1980975 | 2.0 |
| 10 | TRICIL ENVIRONMENTAL SERVICES, INC. (SYSTECH) | 1957105 | 2.0 |
| 11 | UNION CARBIDE CORP | 1736055 | 1.8 |
| 12 | ROCK ISLAND REFINING CORP | 1661945 | 1.7 |
| 13 | FORD MOTOR CO. | 1519050 | 1.6 |
| 14 | LILLY INDUSTRIAL COATINGS | 1504785 | 1.6 |
| 15 | ALUMINUM COMPANY OF AMERICA (ALCOA) | 1188044 | 1.2 |
| 16 | GENERAL MOTORS CORP (CHEVROLET, DELCO, FISHER) | 1169047 | 1.2 |
| 17 | B.D.P. CO. OF INDIANAPOLIS | 1057370 | 1.1 |
| 18 | STOLLE CORP | 813815 | 0.8 |
| 19 | K. & F. INDUSTRIES | 796840 | 0.8 |
| 20 | PILLSBURY CO. (GREEN GIANT) | 719600 | 0.7 |
| 21 | J. I. CASE CO. | 555665 | 0.6 |
| 22 | LOGANSPOUT MUNICIPAL UTILITIES | 426300 | 0.4 |
| 23 | RECLAIMED ENERGY CO. | 313995 | 0.3 |
| 24 | SUN CHEMICAL CORP | 288735 | 0.3 |
| 25 | REILLY TAR AND CHEMICAL | 280000 | 0.3 |
| 26 | SNI INDUSTRIES | 269280 | 0.3 |
| 27 | TITAN OIL | 233900 | 0.2 |
| 28 | GENERAL TIRE AND RUBBER CO. | 229405 | 0.2 |
| 29 | BATESVILLE CASKET CO., INC. (HILLENBRAND) | 221518 | 0.2 |
| 30 | COMMERCIAL SEWER CLEANING CO. | 202600 | 0.2 |
| 31 | ARVIN INDUSTRIES, INC. | 197295 | 0.2 |
| 32 | HONEYWELL, INC. | 192610 | 0.2 |
| 33 | KEIL CHEMICAL, DIV. OF FERRO CORP | 192282 | 0.2 |
| 34 | MESTINGHOUSE ELECTRIC CORP | 184231 | 0.2 |
| 35 | FORT BENJAMIN HARRISON (DEPT OF ARMY) | 155700 | 0.2 |
| 36 | HEAR BLADES MFG. CORP | 152620 | 0.2 |
| 37 | ROULF FIBERGLASS, BWH | 143870 | 0.1 |
| 38 | FRITO-LAY CO. | 139896 | 0.1 |
| 39 | ALLIS CHALMERS CORP | 139455 | 0.1 |
| 40 | TRM, INC. (MANSEY CORP, ROSS BEAR DIV.) | 132828 | 0.1 |
| 41 | JEFFBORT, INC. | 131331 | 0.1 |
| 42 | MIDWEST CONSTRUCTION CO. | 130600 | 0.1 |
| 43 | GENERAL ELECTRIC | 116280 | 0.1 |

PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

| Rank | Potentially Responsible Party | Amount (gallons) | Per Cent of Total |
|------|--|---------------------|----------------------|
| 44 | CARBORUNDUM CO. (COMMERCIAL FILTERS DIV.) | 114900 | 0.1 |
| 45 | DURABOND PRODUCTS | 110385 | 0.1 |
| 46 | HILL-ROM COMPANY, INC. (HILLENBRAND) | 105491 | 0.1 |
| 47 | NATIONAL RAILROAD PASSENGER CORP (AMTRAK) | 99100 | 0.1 |
| 48 | P. A. G. SEEDS (CARGILL INC.) | 97750 | 0.1 |
| 49 | PEERLESS PUMP | 94600 | 0.1 |
| 50 | RUTGERS PACKAGING CHEMICALS | 91890 | 0.1 |
| 51 | TOMKA TOYS | 89815 | 0.1 |
| 52 | AMHEUSER-BUSCH INDUSTRIAL PRODUCTS CORP | 88805 | 0.1 |
| 53 | PRATT AND LAMBERT, INC. | 85885 | 0.1 |
| 54 | SRA INC. | 85800 | 0.1 |
| 55 | PHILLIPS PETROLEUM CO. | 85285 | 0.1 |
| 56 | U.S. GYPSUM | 77055 | 0.1 |
| 57 | ANDERSON CO. (ANDERSON WINDOWS) | 72325 | 0.1 |
| 58 | INDUS WHEEL CO. (CARLISLE CORP) | 71885 | 0.1 |
| 59 | SPILL RECOVERY OF INDIANA (MIDWEST DIESEL & T | 70908 | 0.1 |
| 60 | PT COMPONENTS (LINK-BELT BEARINGS DIV.) | 67760 | 0.1 |
| 61 | RCA CORP | 67157 | 0.1 |
| 62 | MCDONNELL DOUGLAS ELECTRONICS CO. | 64535 | 0.1 |
| 63 | MID-STATE CUMMINS (CUMMINS ENGINE) | 62155 | 0.1 |
| 64 | WASTEX-RESEARCH, INC. | 61380 | 0.1 |
| 65 | SHELL OIL CO. | 61000 | 0.1 |
| 66 | FREIGHTLINER CORP | 60775 | 0.1 |
| 67 | U.S. DEPT. OF NAVY (NDSL, NMSC CRANE, AVIONICS | 57956 | 0.1 |
| 68 | BROCKWAY, INC. | 57500 | 0.1 |
| 69 | KERR-MCGEE CORP | 55680 | 0.1 |
| 70 | FIRESTONE INDUSTRIAL PRODUCTS CO. | 54395 | 0.1 |
| 71 | BIDDLE SCREW PRODUCTS | 54000 | 0.1 |
| 72 | ALLEGHENY LUDLUM | 45345 | 0.0 |
| 73 | LOUISVILLE COURIER JOURNAL | 44605 | 0.0 |
| 74 | FMC CORP | 40125 | 0.0 |
| 75 | PPG INDUSTRIES | 39430 | 0.0 |
| 76 | KLOR-KLEEN | 39325 | 0.0 |
| 77 | INDUSTRIAL PLATING, INC. | 37180 | 0.0 |
| 78 | ANDCO CORP | 37112 | 0.0 |
| 79 | GURNEY J. BUSH, INC. | 35335 | 0.0 |
| 80 | SOURCE 9 COMPANY | 34340 | 0.0 |
| 81 | QUEENS GROUP INDIANA, INC. (RUTGERS PACKAGING | 32890 | 0.0 |
| 82 | JOSAM MFG. | 31750 | 0.0 |
| 83 | ELECTRIC STEEL CASTING | 31500 | 0.0 |
| 84 | EGYPTIAN LACQUER MFG. CO., INC. | 30635 | 0.0 |
| 85 | UNIROYAL, INC. | 29645 | 0.0 |
| 86 | ROSTONE CORP (ALLEN-BRADLEY) | 29480 | 0.0 |

PHASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

| Rank | Potentially Responsible Party | Amount (gallons) | Per Cent of Total |
|------|---|---------------------|----------------------|
| 87 | NRX MARS CO., INC. | 27600 | 0.0 |
| 88 | PORTER PAINT CO. | 25740 | 0.0 |
| 89 | INDIANA STATE HIGHWAY COMMISSION | 25370 | 0.0 |
| 90 | WHIRLPOOL CORP | 22605 | 0.0 |
| 91 | ECONOMY PLATING CO., INC. | 21500 | 0.0 |
| 92 | HAZNET ENVIRONMENTAL GROUP, INC. | 20000 | 0.0 |
| 93 | GIBSON | 18235 | 0.0 |
| 94 | AMERICAN LATEX CORP | 17775 | 0.0 |
| 95 | MOOSIER STATE INDUSTRIES | 16775 | 0.0 |
| 96 | M. S. CORP | 16555 | 0.0 |
| 97 | SMITH SYSTEMS | 16445 | 0.0 |
| 98 | ELLIOT-WILLIAMS CO., INC. | 15235 | 0.0 |
| 99 | HANCHAR IND. WASTE MGT. (ANTHONY;CONTINENTAL) | 14795 | 0.0 |
| 100 | FRED REEDE TRUCKING | 14650 | 0.0 |
| 101 | BROOKSIDE CORP | 14630 | 0.0 |
| 102 | INDIANAPOLIS STAR NEWS | 14465 | 0.0 |
| 103 | WEBB WHEEL | 13500 | 0.0 |
| 104 | AMERICAN CAN CO. | 13315 | 0.0 |
| 105 | COCA COLA CO. (FOODS DIV.) | 12745 | 0.0 |
| 106 | FEDERAL CORRECTIONAL INSTITUTE | 12100 | 0.0 |
| 107 | SULLAIR CORP | 11880 | 0.0 |
| 108 | GENERAL MILLS | 11715 | 0.0 |
| 109 | STEWART PAINT MFG. CO. | 10890 | 0.0 |
| 110 | PETER-REVINGTON FURNITURE | 10800 | 0.0 |
| 111 | SHELBY PAINT AND ENAMEL CO. | 10135 | 0.0 |
| 112 | TEXACO OIL | 10000 | 0.0 |
| 113 | SERVICE SPRING CO. | 9680 | 0.0 |
| 114 | LENK CO. (LENK MFG, DRACKETT, BRISTOL-MEYERS) | 9570 | 0.0 |
| 115 | KROGER COMPANY | 9183 | 0.0 |
| 116 | PEPSI-COLA BOTTLING GROUP | 9000 | 0.0 |
| 117 | SPERRY UNIVAC (AMERICAN DIV.) | 8910 | 0.0 |
| 118 | GREAT DANE TRAILERS | 8855 | 0.0 |
| 119 | ATLAN. RCHFLD. (ANACONDA-ERICSSON/WIRE & CABLE) | 8490 | 0.0 |
| 120 | WILLIAMSON CO. | 8430 | 0.0 |
| 121 | CROWN ZELLERBACH CORP | 8360 | 0.0 |
| 122 | LTV STEEL CO. | 8030 | 0.0 |
| 123 | M & B TRUCKING | 8000 | 0.0 |
| 124 | EL. S. WOOD (LEXINGTON BLUE GRASS ARMY DE | 7890 | 0.0 |
| 125 | NEBBS SERVICES (ARATEX SERVICES, INC.) | 7800 | 0.0 |
| 126 | MAGNETIC PERIPHERALS, INC. (CONTROL DATA CORP | 7645 | 0.0 |
| 127 | INDIANA STEEL & WIRE | 7535 | 0.0 |
| 127 | PAND CORP | 7535 | 0.0 |
| 129 | MARATHON PETROLEUM CO. | 7133 | 0.0 |

09/14/87

Page 4

PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

| Rank | Potentially Responsible Party | Amount (gallons) | Per Cent of Total |
|------|---|---------------------|----------------------|
| 130 | IND WASTE, INC. | 6600 | 0.0 |
| 131 | COGHILL, JOHN | 6000 | 0.0 |
| 132 | KENDALL CO. | 5995 | 0.0 |
| 133 | RELIANCE ELECTRIC CO. (REEVES DIV.) | 5775 | 0.0 |
| 134 | BLUEGRASS CHEMICAL | 5610 | 0.0 |
| 135 | IVC INDUSTRIAL COATINGS | 5500 | 0.0 |
| 135 | PARK 100 FOODS | 5500 | 0.0 |
| 137 | PHILIPS INDUSTRIES, INC. (LAU INDUSTRIES) | 4950 | 0.0 |
| 138 | HOMMET TURBINE COMPONENTS CORP | 4840 | 0.0 |
| 139 | FELTZER, SCOTT | 4510 | 0.0 |
| 140 | BRUNING PAINT CO. | 4400 | 0.0 |
| 140 | JONES INSULATION CO., INC. | 4400 | 0.0 |
| 140 | MALLORY TIMES (EMHART CORPORATION) | 4400 | 0.0 |
| 140 | UNITED REFRIGERATION | 4400 | 0.0 |
| 140 | WESTERN ELECTRIC | 4400 | 0.0 |
| 145 | E. R. CARPENTER, CO. | 4345 | 0.0 |
| 146 | GOULD, INC. | 4344 | 0.0 |
| 147 | LOUISVILLE VARNISH CO., INC. | 4290 | 0.0 |
| 148 | MORRIS MACHINE CO. | 4235 | 0.0 |
| 149 | PRISTINE, INC. | 4180 | 0.0 |
| 150 | INDIANAPOLIS PAVEMENT SEALING AND MAINTENANCE | 4000 | 0.0 |
| 150 | PENN DIXIE | 4000 | 0.0 |
| 152 | PAPER, CALMENSEN AND CO. (PACAL STEEL) | 3960 | 0.0 |
| 153 | WOODALL INDUSTRIES | 3905 | 0.0 |
| 154 | BUCKBEE MEARS CO. (AQUARIUS SOFT LENS) | 3770 | 0.0 |
| 155 | CLEVELAND TRENCHER | 3740 | 0.0 |
| 155 | UNION STEEL | 3740 | 0.0 |
| 157 | WOODALL INDUSTRIES | 3685 | 0.0 |
| 158 | WHITE METALS | 3575 | 0.0 |
| 159 | UNITED PARCEL SERVICE | 3465 | 0.0 |
| 160 | HOLCOMB & HOKE MANUFACTURING CO., INC. | 3190 | 0.0 |
| 161 | MIDLAND PAINT COMPANY | 3080 | 0.0 |
| 162 | AMERICAN MAGNETICS | 3000 | 0.0 |
| 163 | SMITH-ALEEN, INC. | 2830 | 0.0 |
| 164 | NORTHLAND ALUMINUM PRODUCTS, INC. | 2750 | 0.0 |
| 165 | WASTE MANAGEMENT OF INDIANAPOLIS INC. | 2640 | 0.0 |
| 166 | MID-STATES STEEL AND WIRE (KEYSTONE CONDOLIDA | 2585 | 0.0 |
| 166 | PILLSBURY CO. | 2585 | 0.0 |
| 168 | ERBRICH PRODUCTS | 2500 | 0.0 |
| 169 | CHEMLAWN CORP | 2420 | 0.0 |
| 170 | MOBIL CHEMICAL CO. (MOBIL CORP) | 2400 | 0.0 |
| 171 | INTERNATIONAL HARVESTER CO. | 2345 | 0.0 |
| 172 | SUPERIOR SOLVENTS (SUPERIOR OIL CO.) | 2310 | 0.0 |

PPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

| Rank | Potentially Responsible Party | Amount (gallons) | Per Cent of Total |
|------|--|---------------------|----------------------|
| 172 | MESTVACO CORP (U. S. ENVELOPE DIV.) | 2310 | 0.0 |
| 174 | CONSOLIDATED PRINTING | 2145 | 0.0 |
| 175 | AUTO DEALERS | 2000 | 0.0 |
| 175 | N. BAKER & SON | 2000 | 0.0 |
| 177 | BOISE CASCADE CORP | 1980 | 0.0 |
| 178 | EDWIN CORP | 1950 | 0.0 |
| 179 | OMATONNA MANUFACTURING CO. | 1925 | 0.0 |
| 180 | FROST PAINT & OIL CORP | 1870 | 0.0 |
| 181 | A. E. STALEY MFG. CO. | 1760 | 0.0 |
| 182 | NORFOLK AND WESTERN RAILROAD CO. | 1650 | 0.0 |
| 183 | DIAMOND GLASS CO. (DIAMOND-BATHURST, GLASS CO) | 1640 | 0.0 |
| 184 | SPRAGUE ELECTRICAL CO. | 1595 | 0.0 |
| 185 | RADIO MATERIAL CORP | 1540 | 0.0 |
| 186 | COMMERCIAL TONEL | 1500 | 0.0 |
| 187 | EDCO PRODUCTS, INC. | 1485 | 0.0 |
| 188 | CONOVERVILLE PAINT MANUFACTURING CO., INC. | 1430 | 0.0 |
| 189 | AMERICAN HOIST AND DERRICK (CLEVELAND TRENCH) | 1375 | 0.0 |
| 190 | THERMOSET PLASTICS | 1365 | 0.0 |
| 191 | ASHLAND CHEMICAL CO. | 1320 | 0.0 |
| 191 | SAN MILLER BAG COMPANY | 1320 | 0.0 |
| 191 | VOLLATH REFRIGERATION, INC. | 1320 | 0.0 |
| 194 | INGRESS PLASTINE | 1210 | 0.0 |
| 195 | BORDEN CO. | 1200 | 0.0 |
| 196 | AMPHENOL CORP | 1155 | 0.0 |
| 196 | BAOW GROUP | 1155 | 0.0 |
| 198 | BROTE MANUFACTURING CO. | 1100 | 0.0 |
| 198 | PRINTING CO., INC. | 1100 | 0.0 |
| 198 | WITCO (RICHARDSON BATT PTS; RICHARDSON RUBBER) | 1100 | 0.0 |
| 201 | MINNESOTA RUBBER | 1060 | 0.0 |
| 202 | PERRY CHEMICAL & MFG. CO., INC. | 1045 | 0.0 |
| 202 | SUPPLY FINISHING CO. | 1045 | 0.0 |
| 204 | CITY OF LEBANON | 990 | 0.0 |
| 205 | CIRCUIT SERVICE | 935 | 0.0 |
| 206 | ADVANCED CIRCUITS, INC. | 880 | 0.0 |
| 206 | DU-MEL PRODUCTS, INC. | 880 | 0.0 |
| 208 | MEYER INDUSTRIES | 825 | 0.0 |
| 209 | BAKER INDUSTRIES, INC. | 800 | 0.0 |
| 210 | INSULATORS OF INDIANA | 770 | 0.0 |
| 210 | PELCON SERVICE | 770 | 0.0 |
| 210 | UNIVERSAL COATING | 770 | 0.0 |
| 213 | INGERSOLL-RAND CO. (VON DUPRIN, INC.) | 605 | 0.0 |
| 214 | CITY MACHINE | 550 | 0.0 |
| 214 | SPECIALTY MFG. CO. | 550 | 0.0 |

PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

| Rank | Potentially Responsible Party | Amount (gallons) | Per Cent of Total |
|------------------|---|---------------------|----------------------|
| 216 | DETREX CHEMICAL INDUSTRIES, INC. (BOLD SHIELD | 495 | 0.0 |
| 216 | FEDERAL CHEMICAL | 495 | 0.0 |
| 218 | CENTRAL TRANSPORT, INC. | 440 | 0.0 |
| 218 | ENVIRONMENTAL ENTERPRISES INC. | 440 | 0.0 |
| 218 | NORTH AMERICAN PHILIPS CORP (CENTRALAB, INC.) | 440 | 0.0 |
| 221 | KODAK | 385 | 0.0 |
| 221 | MCCORMICKS AND COMPANY, INC. | 385 | 0.0 |
| 223 | BRAINERD CO. | 330 | 0.0 |
| 223 | CENTURY MFG. | 330 | 0.0 |
| 223 | M. B. FULLER CO. | 330 | 0.0 |
| 226 | CRYOGENIC ASSOCIATION | 315 | 0.0 |
| 227 | ELECTRA PRODUCTS CORP | 275 | 0.0 |
| 227 | TRON CHEMICS RESEARCH INC. | 275 | 0.0 |
| 229 | KEENE MONON, INC. | 220 | 0.0 |
| 229 | UNIVERSITY OF MINNESOTA | 220 | 0.0 |
| 231 | GEORGE CRAW CO. | 200 | 0.0 |
| 232 | BEST FOODS (CPC INTERNATIONAL, INC.) | 165 | 0.0 |
| 232 | DECKER EQUIPMENT SALES | 165 | 0.0 |
| 232 | INDIANA TESTING | 165 | 0.0 |
| 232 | SOUTHSIDE DODGE | 165 | 0.0 |
| 232 | NORTRONICS CO., INC. | 165 | 0.0 |
| 237 | BOEHRINGER MANNHEIM DIAGNOSTICS (BIO DYNAMICS | 110 | 0.0 |
| 237 | PRESTON TRUCKING | 110 | 0.0 |
| 237 | TESCOM CORP | 110 | 0.0 |
| 237 | ZIONSVILLE SCHOOL DISTRICT | 110 | 0.0 |
| 241 | INDIANA UNIV PURDUE UNIV AT INDPLS | 55 | 0.0 |
| 241 | MOUNT SINAI HOSPITAL | 55 | 0.0 |
| 243 | INDIANA STATE BOARD OF HEALTH | 6 | 0.0 |
| 244 | PIKE TURP. FIRE DEPT. | 5 | 0.0 |
| Total — 244 PRPs | | 96810974 | 98.7% |



U.S. Department of Justice

Washington, D.C. 20530

January , 1987

To:

Re: Envirochem and Northside Sanitary
Landfill CERCLA Sites

The United States Department of Justice and the United States Environmental Protection Agency are sending you this letter because, according to current information, you are a potentially responsible party ("PRP") at one or both of the above sites. This means you may have legal liability under federal hazardous waste laws. Important events are taking place now and in coming months which may have a bearing on the extent of your liability.

You may wish to participate in these events. If you do not, you may lose an important opportunity.

Most PRPs previously received notices from EPA about these sites. Some PRPs are involved with committees who are in regular contact with EPA about the sites (this is discussed further below). Some PRPs were involved in a partial settlement in 1983 concerning the Envirochem site, and some PRPs currently are defendants in litigation concerning Envirochem. All of these PRPs may be affected by the events described below, but different groups of PRPs may be affected in quite different ways.

Previously, EPA and the Justice Department dealt with the Envirochem and Northside sites separately. However, because the sites are adjacent and because the cleanup measures for these sites are interdependent, we now are addressing them together.

1. Background

Envirochem is the site of a former chemical recycling business which ceased operation in 1982. In 1983 EPA notified several hundred PRPs of their possible liability at the site. After negotiations, approximately 250 of these PRPs agreed to perform a cleanup of surface contamination at a cost of about \$2.9 million. EPA sued a number of PRPs who did not settle, and

later learned of additional PRPs. A total of approximately 250 Envirochem PRPs did not participate in this partial settlement. These PRPs are referred to as the Envirochem "nonsettlers." After the surface cleanup EPA began a study of groundwater contamination at the site.

The Northside Sanitary Landfill is next to Envirochem. At present Northside is used only for disposal of municipal solid waste, but in the past, the landfill also accepted hazardous waste. EPA previously sent notices to about 220 PRPs at Northside. Approximately an additional 80 PRPs are being notified for the first time by this letter. EPA has been studying groundwater contamination at Northside caused by the past hazardous waste disposal.

EPA recently completed its studies of groundwater contamination at the sites and of possible ways to remedy the contamination. EPA has recommended a remedy which, if implemented, would cost an estimated \$33.9 million. Under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9601, et seq. ("CERCLA"), the PRPs may be liable either to perform, or to pay for, this remedy. EPA also has incurred approximately \$4 million in past costs at the sites for which the PRPs may be liable.

2. The Steering Committees

Because of the large number of PRPs, various groups of PRPs have formed steering committees. These committees coordinate the PRPs' activities, assist in negotiations between the PRPs and the government, and facilitate communications among the PRPs and between the PRPs and the government.

The activities of the steering committees are important and could affect all PRPs, including those who are not involved with a committee. For example, the committees have hired their own technical experts and may give comments to EPA about the proposed remedy. The committees may negotiate with the government about settlement. As the remedy selection process and negotiations progress, the committees may be in frequent contact with EPA and the Justice Department.

If you are already involved with a steering committee, now is an important time to be in contact with it. If you are not involved, you may wish to contact the appropriate committee. Contacts for the committees are as follows:

For the Envirochem settlers (those who signed the 1983 consent decree):

Norman W. Bernstein, Esq.
Ford Motor Company
The American Road
Room 1123
Dearborn, Michigan 48126
(313) 322-4891

For the Envirochem nonsettlers (those who did not sign the 1983 consent decree, including both those who are, and those who are not, defendants in the lawsuit filed in 1983):

Lisa L. Fleming, Esq.
Jeffboat, Incorporated
1701 East Market Street
Jeffersonville, Indiana 47130
(812) 288-0293

For all PRPs at Northside:

John M. Kyle, Esq.
Bryan G. Tabler, Esq.
Barnes & Thornburg
1313 Merchants Bank Building
11 South Meridian Street
Indianapolis, Indiana 46204
(317) 638-1313

3. The Remedy Selection Process

EPA has conducted lengthy studies of groundwater contamination at the sites and of various ways to remedy the contamination. Documents known as the "Remedial Investigation" and "Feasibility Study" for each site contain the results of these investigations. A document known as the "Combined Alternatives Analysis" describes alternatives for remedying the contamination at both sites, and recommends one of these alternatives for implementation. All of these documents are publicly available. Copies have been given to the steering committees.

EPA's recommended alternative for remedying contamination at the sites consists of measures to prevent access to the sites, a multilayer cap over the sites to prevent contact by people and animals with contaminated soil and to prevent water from infiltrating, and a system to pump out and

treat contaminated landfill leachate and groundwater. EPA estimates the cost of this remedy at a present value of \$33.9 million. Some of the other alternatives listed by EPA cost more and some cost less.

The PRPs have an interest in the remedy because they may be legally liable to perform or pay for it. Other groups have other interests. For example, neighbors of the sites and other members of the general public wish to receive the full level of protection from hazardous waste contamination to which they are entitled under CERCLA.

EPA's remedy selection is not yet final. CERCLA establishes procedures for making the final remedy selection. Under these procedures EPA provides the public, including the PRPs, an opportunity to participate and express their views. This process is now underway. On December 17, 1986 EPA held a public meeting in Zionsville, Indiana to explain the recommended remedy and accept comments. EPA provided public notice of this meeting in the manner specified by CERCLA. Representatives of the steering committees attended.

This meeting opened a period for public comment on EPA's recommended remedy. The public comment period is scheduled to end on February 28, 1987. If members of the public, or the PRPs, wish to comment on EPA's remedy selection or otherwise express their views, they should do so within the public comment period.

Enclosed with this letter is a fact sheet prepared by EPA describing the sites, the remedy alternatives and their cost, and the remedy selection process. If you wish to contact EPA, page 6 of the Fact Sheet lists names, addresses and telephone numbers of individuals you may contact. You may also wish to contact one of the steering committees.

After the public comment period closes, EPA will evaluate the comments it received and make the final selection of a remedy. Timing is uncertain, but the final selection currently is scheduled for early June, 1987.

4. Future Events

The United States will give the PRPs an opportunity to design and implement the remedy ultimately selected. In addition to informal discussions which are taking place now, the United States may open a period of formal negotiations. The United States also will ask the PRPs to pay EPA's past costs. We expect to know by approximately June whether a settlement of these matters is likely to occur.

If no settlement is reached, the United States has two options. One is to file a lawsuit (or amend the existing Envirochem complaint) to require the PRPs to perform the remedy. The second option is for EPA to perform the remedy itself, and sue the PRPs to recover EPA's costs. If only some PRPs settle with the United States, they may sue PRPs who do not settle.

Please review this situation carefully. You may have much at stake.

Sincerely,

Mark E. Grummer, Senior Attorney
Land and Natural Resources Division
U.S. Department of Justice
Washington, D.C. 20530

Robert E. Leininger
Assistant Regional Counsel
U.S. Environmental Protection Agency - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Enclosure



UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY

REGION V
230 SOUTH DEARBORN
CHICAGO, IL 60604

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

548-12



45356
REASON CHECKED
Unclaimed _____
Attempted—Not known _____
Insufficient Address _____
No such street _____
No such office in state _____
Forwarding order expires _____
Do not return in this envelope _____
Other _____

old address!

CHUCK'S SEPTIC TANK SERVICE
818 E. GALLERY RD
PIQUA, OH 45356

45356
REASON CHECKED
Unclaimed _____
Attempted—Not known _____
Insufficient Address _____
No such street _____
No such office in state _____
Forwarding order expires _____
Do not return in this envelope _____
Other _____

Fold at line over top of envelope to the right
of the return address.

CERTIFIED

P 681 171 072

MAIL

Claim Check
No. 437385

☐ Hold

Date: 2-15-88

1ST Notice

2ND Notice

Return

Detached from
PS Form 3849-A,
Oct. 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. ☐ Restricted Delivery
↑(Extra charge)↑ ↑(Extra charge)↑

| | |
|---|---|
| 3. Article Addressed to: | 4. Article Number |
| CHUCK'S SEPTIC TANK SERVICE 818 E. GALLERY RD PIQUA, OH 45356 | P681171072 |
| | Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail |
| | Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> . |
| 5. Signature — Addressee X | 8. Addressee's Address (ONLY if requested and fee paid) |
| 6. Signature — Agent X | |
| 7. Date of Delivery | |

PS Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT